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FILED
DISTRICT COURT OF GUAM

JAN 23 2008

JEANNE G. QUINATA
Clerk of Court

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE TERRITORY OF GUAM

14 UNITED STATES OF AMERICA,
15
16 Plaintiff,

17 vs.

18 DONG SIK JUNG,

19 Defendant.

CRIMINAL CASE NO. 06-00074

SUPERSEDING INDICTMENT

CRIMINAL CONSPIRACY
[18 U.S.C. §§ 2 & 371]

FRAUD IN CONNECTION WITH
IDENTIFICATION DOCUMENTS
[18 U.S.C. §§ 2; 1028(a)(1); 1028(b)(1)(A)(ii)
& 1028(c)(3)(A)]

20 THE GRAND JURY CHARGES:

21 COUNT I - CRIMINAL CONSPIRACY

22 On or about February 8, 2005, within the District of Guam, the defendant herein, DONG
23 SIK JUNG, did willfully and knowingly combine, conspire, confederate and agree with Eun
24 Young Lee and others, both known and unknown to the Grand Jury, to commit the offense of
25 Fraud in Connection with Identification Documents, in violation of Title 18, United States Code,
26 Section 1028(a)(1), and to aid, abet, counsel, command, induce and procure the conspiracy
27 charged in this count and willfully cause others to perform acts and make statements in
28 furtherance of the conspiracy, and did perform at least an overt act for the purpose of carrying out

1 the conspiracy, to-wit: the submission of an application for a Guam driver's license, said
2 application bearing a false Taxpayer Identification Number (TIN) 952-19-4802,

3 ALL IN VIOLATION OF Title 18, United States Code, Sections 2 and 371.

4 **COUNT II - FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENT**

5 On or about February 8, 2005, in the District of Guam, the defendant herein, DONG SIK
6 JUNG, did knowingly and without lawful authority produce an identification document,
7 authentication feature and false identification document, to-wit: Guam driver's license number
8 1228107943 by means of a false Internal Revenue Service Taxpayer Identification Number (TIN)
9 952-19-4802, and the production of said driver's license was in and affected interstate and
10 foreign commerce.

11 ALL IN VIOLATION of Title 18, United States Code, Sections 2, 1028(a)(1),
12 1028(b)(1)(A)(ii) and 1028(c)(3)(A).

13 DATED this 23rd day of JANUARY 2008.

14 A TRUE BILL.

15
16
17 **REDACTED**

18 LEONARDO M. RAPADAS
19 United States Attorney
20 Districts of Guam and NMI

21 By: Karon V. Johnson

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23 Assistant U.S. Attorney

24 Reviewed:

25 By: Jeffrey J. Strand

26 JEFFREY J. STRAND
27 First Assistant U.S. Attorney
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